



Jordan Cove LNG
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April 1, 2019

Mr. Christopher Stine, Water Quality Engineer
Oregon Department of Environmental Quality
165 East 7th Ave., Suite 100
Eugene, OR 97401

Re: Jordan Cove Energy Project L.P. and Pacific Connector Gas Pipeline, L.P. Section 401 Water Quality Certification –Response to ODEQ Additional Information Request received September 25, 2018.

Dear Mr. Stine:

On September 21, 2017, Jordan Cove Energy Project L.P. ("JCEP") filed an application pursuant to Section 3(a) of the Natural Gas Act, as amended, and Parts 153 and 380 of the regulations of the Federal Energy Regulatory Commission ("Commission")/ for authorization to site, construct, and operate certain liquefied natural gas facilities ("LNG Terminal"). On the same day, Pacific Connector Gas Pipeline, LP ("PCGP", and together with JCEP, "Jordan Cove") filed an application pursuant to Section 7(c) of the NGA, 3 and Parts 157 and 284 of the Commission's regulations, 4 for a certificate of public convenience and necessity authorizing PCGP to construct, install, own, and operate a new natural gas pipeline ("Pipeline", and together with the LNG Terminal, "the Project").

Section 401(a) of the Clean Water Act, 33 U.S.C. § 1341(a), requires an applicant for "a Federal license or permit to conduct any activity which may result in a discharge into the navigable waters" to provide the federal licensing or permitting agency a certification from the relevant state that the discharge will comply with applicable state water quality standards. Accordingly, on October 22, 2017, Jordan Cove submitted an application for a Section 401 Water Quality Certification for the Project to the Oregon Department of Environmental Quality ("ODEQ") for review.

Jordan Cove's request for certification under Section 401 of the Clean Water Act provides a description of the proposed activities subject to federal permitting that may result in discharges into waters of the U.S. The application does not address activities and/or potential discharges outside of the scope of these federally- authorized proposed activities. Supplemental application materials were also provided to ODEQ on February 6, 2018, May 21, 2018, November 21, 2018 and March 19, 2019.

The application provides a description of the proposed activities subject to federal permitting that may result in discharges. We agree that ODEQ's review is limited to ensuring that discharges resulting from the federally permitted activities comply with applicable state water quality standards. The application does not address activities and/or discharges outside of the scope of the federal permits necessary for the Project. Jordan Cove understands that other state permits and authorizations may be required to construct or operate the Project, and that ODEQ may condition its Section 401 certification on the issuance of other state permits and authorizations necessary to assure compliance with state water quality standards.



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On September 25, 2018, Jordan Cove received an additional information request (AIR) from ODEQ specific to the LNG Terminal Stormwater Management Plan. On October 25, 2018, Jordan Cove submitted a partial response to the September 25th AIR; however, that response did not include a revised LNG Terminal Stormwater Management Plan incorporating the requirements and guidance found in the March 2018 Section 401 Water Quality Certification Post-Construction Stormwater Management Plan Submission Guidelines (Submission Guidelines). The majority of the remaining information requests in the September 25th AIR were specific examples of information that should be included in the revised plan. Attachment A outlines the detailed responses to ODEQ's September 25th AIR. The revised LNG Terminal Stormwater Management Plan is attached here as Attachment B. Finally, ODEQ's September 25th AIR sought additional information regarding JCEP's plans to address stormwater management post construction. This request is addressed in the Post-Construction Stormwater Management Plan attached as Attachment C. This Post-Construction plan addresses the Kentuck site, APCO 2 and the TPP 101 widening.

Jordan Cove appreciates ODEQ's review efforts to date and looks forward to continued work with ODEQ on the Section 401 water quality certification. Should you have any questions, please contact Derik Vowels at dvowels@pembina.com or 971-940-7800.

Sincerely,

/s/ Natalie Eades

Natalie Eades
Manager, Environment and Regulatory
Jordan Cove Energy Project L.P.
Pacific Connector Gas Pipeline, LP

Attachments

Attachment A: Additional Response to September 25, 2018 Additional Information Request

Attachment B: LNG Terminal Stormwater Management Plan (Rev 3 - March 29, 2019)

Attachment C: Post-construction Stormwater Management (Kentuck, APCO 2 and TPP 101 Widening)